MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
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NorthWestern Corporation
Dry Creek Compressor Station
Southeast ¼ of the Southwest ¼ of Section 34, Township 6 South, Range 21 East, Carbon County
40 East Broadway
Butte, MT 59701

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		Method 9, Portable Analyzer
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		As applicable
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting	X		Permit #2784-05
New Source Performance Standards (NSPS)	X		Subpart KKK
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
State Implementation Plan (SIP)	X		General SIP

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SECTION I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the EPA and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the administrative amendment requests submitted by NorthWestern Corporation (NorthWestern) on October 14, 2003, June 12, 2003, February 11, 2003, and October 15, 2002. In addition, conclusions in this document are also based on the Operating Permit Application #OP2784-01 and Preconstruction Permit Application #2784-03 submitted by NorthWestern (as Montana Power Company (MPC)) on August 24, 2000. Further, the conclusions in this document are also based on the original Operating Permit Application submitted by NorthWestern (as MPC) and received by the Department on June 7, 1996.

B. Facility Location

NorthWestern owns and operates the Dry Creek Field Compressor Station. This facility is located in the Southeast ¼ of the Southwest ¼ of Section 34, Township 6 South, Range 21 East in Carbon County, Montana. Carbon County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The Dry Creek Field Compressor Station is located on a two-acre site in Carbon County, approximately 6 miles northeast of Red Lodge near Big Slide Mountain.

C. Facility Background Information

Preconstruction Permit

On July 14, 1993, MPC was issued Permit **#2784-00** for the operation of their natural gas processing plant and associated equipment at the Dry Creek Field Station 056-1 through 4. Most of the Dry Creek Field was an existing source (it was operating at the same location prior to March 16, 1979) and a Best Available Control Technology (BACT) determination was not required. However, the Joule-Thompson refrigeration unit was a new or altered source since it was installed in 1985. Therefore, a BACT analysis was required for the Joule-Thompson refrigeration unit.

The Joule-Thompson refrigeration unit at the facility is used to separate the heavy-end hydrocarbons from the gas storage field. The unit is completely enclosed and there should be no emissions from the unit during operation. In addition, the flanges and connections are state of the art, further preventing any loss of product from the unit. The Joule-Thompson refrigeration unit is subject to the New Source Performance Standards (NSPS) stated in 40 CFR Part 60, Subpart KKK because it meets the definition of a natural gas processing plant and was installed after January 20, 1984. Some of the NSPS requirements are monthly monitoring of applicable equipment to detect leaks, additional reporting and record keeping requirements, notification requirements, etc. The Department of Environmental Quality (Department) determined BACT for this source to be the proper operation of the Joule-Thompson refrigeration unit to maintain compliance with all standards, limitations, and the reporting, record keeping, and notification requirements as set forth in 40 CFR Part 60, Subpart KKK.

On March 7, 1994, Permit **#2784-01** was issued to MPC. This modification was requested because the Department revised the emission limitation units from grams per brake horsepower-hour (g/bhp-hr) to pounds per hour (lb/hr). The revision was due to varying parameters such as engine revolutions per minute (RPM), operating load (bhp), ambient air temperature, gas temperature, site, elevation, fuel gas quality, air/fuel ratio (AFR), field gas conditions, etc. Rather than limit the engines to a

g/bhp-hr limit, a hourly emission limit allowed some needed operational flexibility. Also, to clarify NO_X mass emission calculations, NO_X emission limitations were identified as NO_2. Permit #2784-01 replaced Permit #2784-00.

On October 5, 1998, MPC was issued Permit **#2784-02**. The alteration incorporated the Smart Ash Burner requirements into the permit, removed General Condition I with reference to application data, and updated the rule references. Permit #2784-02 replaced Permit #2784-01.

On October 11, 2000, Permit **#2784-03** was issued to MPC. The alteration added an 1,100-horsepower (hp) Solar Saturn turbine-driven compressor to the Dry Creek facility. The 1,100-hp Solar Saturn turbine-driven compressor was previously located at MPC's Mainline #3 compressor station (Permit #2997-01) and was installed prior to 1968. The Department made a determination that moving the 1,100-hp Solar Saturn turbine-driven compressor from the Mainline #3 facility to the Dry Creek facility did not alter the operating parameters of the turbine and did not constitute reconstruction; therefore, the turbines installation date was still considered prior to 1968. Permit #2784-03 replaced Permit #2784-02.

On November 23, 2001, MPC notified the Department of a pending merger of MPC with and into Montana Power, L.L.C. (MPC LLC). Due to questions regarding the length of time the new company name would be valid, the Department decided to wait on the name change for the permit. On October 18, 2002, the Department received a request to change the permit from MPC LLC to NorthWestern. This permit action incorporated the name change from MPC LLC to NorthWestern. On December 17, 2002, Permit **#2784-04** replaced Permit #2784-03.

Title V Operating Permit

On June 7, 1996, the Department received an operating permit application for the Dry Creek facility. The application was assigned #OP2784. The permit application was deemed administratively complete on July 7, 1996, and the application was deemed technically complete on August 7, 1996. Permit **#OP2736-00** became final and effective on February 6, 1999.

On August 24, 2000, MPC submitted an air quality permit application to alter the Dry Creek facility. MPC requested to add an 1,100-hp Solar Saturn turbine-driven compressor to the facility. The 1,100-hp Solar Saturn turbine-driven compressor was added to MPC's Preconstruction Permit (#2784-03) on October 11, 2000; however, the change was not incorporated into MPC's Operating Permit (#OP2784-00). This permit action adds the 1,100-hp Solar Saturn turbine-driven compressor to MPC's operating permit. In addition, the legal description of the facility was corrected. Permit **#OP2784-01** replaced Permit #OP2784-00.

On October 15, 2002, the Department received a letter from MPC. MPC notified the Department that MPC has changed their name from MPC to NorthWestern. The current permit action incorporates the name change from MPC to NorthWestern. Permit **#OP2784-02** replaced Permit #OP2784-01.

On February 11, 2003, the Department received a letter from NorthWestern. NorthWestern notified the Department of a change in the responsible official for all of NorthWestern's Facilities. This amendment updated the permit to reflect the change in the responsible official. Permit **#OP2784-03** replaced Permit #OP2784-02.

On June 12, 2003, the Department received a letter from NorthWestern. NorthWestern notified the Department of a change in the responsible official for all of NorthWestern's Facilities. This amendment updated the permit to reflect the change in the responsible official. Permit **#OP2784-04** replaced Permit #OP2784-03.

D. Current Permit Action

On October 16, 2003, the Department received a request from NorthWestern for an administrative amendment of OP2784-04 to update Section V.B.3 of the General Conditions incorporating changes to federal Title V rules CFR 70.6(c)(5)(iii)(B) and 70.6(c)(5)(iii)(C) (to be incorporated into Montana's Title V rules at ARM 17.8.1213) regarding Title V annual compliance certifications. Operating Permit **OP2784-05** replaces OP2784-04.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined that there are no taking or damaging implications. The checklist was completed on October 23, 2003.

F. Compliance Designation

The Dry Creek facility was last inspected on May 20, 2003. During the inspection, the Dry Creek facility was in compliance with applicable permit requirements contained in Permit #OP2784 and Permit #2784. At the time of this permit issuance, the Department believes the Dry Creek facility is in compliance with all applicable regulations and permit conditions.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The Dry Creek Field Compressor Station serves as a natural gas pipeline compressor station. The storage units are used primarily to inject natural gas into the storage field during the off season to replace gas withdrawn by natural feed during the previous heating season. The storage units can be used to withdraw from storage or in transmission service. During withdrawal from storage, the gas is first dehydrated using the glycol contactor vessel(s) and then stripped of the heavy-end hydrocarbons by passing through a Joule-Thompson type refrigeration plant before entering the transmission line at approximately 500 to 700 pounds per square inch guage (psig).

The production compressors withdraw natural gas from local production wells and increase the gas pressure before entering the mechanical refrigeration plant, which removes both water and hydrocarbons heavier than natural gas. The production gas stream then enters the pipeline and is transported east or west, or to the inlet of the storage compressors for injection into the storage field. Discharge pressures on the production compressors range from 350 to 700 psig.

The complex has two other purposes. The first is to pump the field gas up to the required pressure in the natural gas transmission system. Compression of the gas is accomplished using the four compressor engines and the turbine-driven compressor. Three heaters provide heat to the various station facilities. The second purpose is to "dry" the gas as it is being processed using a dehydrator or glycol unit. NorthWestern has four glycol units at this site, which have heat inputs ranging from 175 to 1,000 thousand British thermal units per hour (MBtu per hour). In the mechanical refrigeration unit, gas is treated with a glycol solution, which absorbs the water in the gas stream. The glycol solution is then heated to about 375 degrees Fahrenheit (°F) to drive off the water and return the glycol. The heat necessary for the activity is generated by burning natural gas in the dehydrator reboiler. The Standard Industrial Classification (SIC) for this facility is "Natural Gas Transmission" which has an SIC Code of "4922".

B. Emission Units and Pollution Control Device Identification

Currently, the NorthWestern Dry Creek Field Station is not required to install or operate any air pollution control equipment. The Smart Ash Burner is an incinerator that will control emissions from the burning of oil soaked rags, oil adsorbents, and filters.

C. Categorically Insignificant Sources/Activities

The Administrative Rules of Montana (ARM) 17.8.1201(22)(a) defines an insignificant emissions unit as one that emits less than 5 tons per year of any regulated pollutant, has the potential to emit less than 500 pounds per year of lead or any hazardous air pollutant, and is not regulated by an applicable requirement other than a generally applicable requirement.

The miscellaneous insignificant emissions from the NorthWestern Dry Creek Field Station include emissions from the 175 Mbtu/hr BS & B Reboiler, 256 Mbtu/hr Reboiler, 900 Mbtu/hr Reboiler, 1000 Mbtu/hr BS & B Reboiler, mechanical refrigeration unit, building heaters < 1 million British thermal unit per hour (MMBtu/hr), and process valves. These units are insignificant because they emit less than 5 tons per year of any regulated pollutant.

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

Emission limits for the 800-hp White Superior engine, the 300-hp Ajax DPC engine, and the 360-hp Ajax DPC engine were established under the authority of ARM 17.8.749. The 800-hp White Superior engine has emission limits of 26.5 lb/hr NO_X, 3.17 lb/hr CO, and 0.35 lb/hr VOC. The 300-hp Ajax DPC engine has emission limits of 2.98 lb/hr NO_X, 0.60 lb/hr CO, and 0.66 lb/hr VOC. The 360-hp Ajax DPC engine has emission limits of 3.57 lb/hr NO_X, 0.71 lb/hr CO, and 0.79 lb/hr VOC. The Joule Thompson Refrigeration Unit is subject to 40 CFR Part 60, Subpart KKK. This facility is not subject to PSD regulations.

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements are contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for all emissions units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for a insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo **(i.e., no monitoring)** will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emissions units. However, the Department may request additional testing to determine compliance with the emission limits and standards. If it is determined through testing, using test methods identified in the Montana Source Test Protocol and Procedures Manual, that any emissions unit is out of compliance with any applicable requirement, NorthWestern will not be shielded from an enforcement action even if the required monitoring methods listed in the permit indicate compliance with the applicable requirement.

The semi-annual testing with the portable analyzer for the 800-hp, 300-hp, and 360-hp compressor engines, should provide NorthWestern and the Department with adequate data to assure compliance with the NO_X and CO emission limits in this permit. Since the fuel consumed by the emission units is required to be pipeline quality natural gas, the potential to exceed the opacity, particulate, or sulfur in fuel conditions in this permit is negligible. Therefore, the recordkeeping provisions of this permit should demonstrate compliance with these conditions.

This permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by NorthWestern to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

C. Test Methods and Procedures

This operating permit contains requirements for semi-annual testing with a portable analyzer for the 800-hp, 300-hp, and 360-hp compressor engines. The Department has stipulated that the portable analyzer be capable of achieving performance specifications equivalent to the traditional test methods in 40 CFR 60, Appendix A or shall be capable of meeting the requirements of EPA Conditional Test

Method 022 for the "Determination of Nitric Oxide, Nitrogen Dioxide and NO_X from Stationary Sources by Electrochemical Analyzer." NorthWestern may use another testing procedure as approved in advance by the Department. All tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). NorthWestern will then convert the NO_X and CO emissions test results from a "ppm" value to a "lb/hr" number. Stack gas flow rates shall be determined using EPA Test Methods in 40 CFR 60, Appendix A in order to demonstrate compliance with the emissions limitations in the permit.

The Department will use the portable analyzer test results as a direct measure of compliance. The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, NorthWestern may elect to voluntarily conduct compliance testing to confirm compliance status.

D. Recordkeeping Requirements

The recordkeeping provisions shall be sufficient to meet the provisions of the monitoring requirements and shall include, as necessary, the installation, use and maintenance of the monitoring equipment or methods as well as the following information: the date the analyses were performed, the place and time of the sampling, the company or entity performing the sampling, the analytical techniques or methods used, the results of such analyses, and the operating conditions at the time of the analyses. Retention of the records of all required monitoring data and support information shall be for a period of at least five years from the date of measurement. Support information includes: all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the operating permit. NorthWestern is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, NorthWestern is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

Section IV of the operating permit "Non-applicable Requirements" contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that NorthWestern identified as non-applicable in the original permit application and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Requirement not Identified in the Operating Permit

Applicable Requirement	Reason
Sub-Chapter 1 General Provisions	
ARM 17.8.101 Definitions ARM 17.8.102 Incorporation by Reference - Publication Dates and Availability of Referenced Documents ARM 17.8.103 Incorporation by Reference	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
Sub-Chapter 2 Ambient Air Quality	
ARM 17.8.201 Definitions ARM 17.8.202 Incorporation by Reference	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.205 Enforceability ARM 17.8.206 Methods and Data ARM 17.8.210 Ambient Air Quality Standard for Sulfur Dioxide ARM 17.8.211 Ambient Air Quality Standard for Nitrogen Dioxide ARM 17.8.212 Ambient Air Quality Standard for Carbon Monoxide ARM 17.8.213 Ambient Air Quality Standard for Ozone ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter ARM 17.8.221 Ambient Air Quality Standard for Visibility ARM 17.8.222 Ambient Air Quality Standard for Lead ARM 17.8.223 Ambient Air Quality Standard for PM-10 ARM 17.8.230 Fluoride in Forage	These rules are always applicable to a major source and may contain specific requirements for compliance. However, these rules have been excluded as an applicable requirement (ARM 17.8.1202).
Sub-Chapter 3 Emission Standards	
ARM 17.8.322 Sulfur oxide emissions - Sulfur in Fuel	This facility burns both liquid and solid fuel at the facility. Therefore, this rule is applicable to the facility.
ARM 17.8.326 Prohibited Materials for Wood or Coal Residential Stoves	This regulation may not be applicable to the source at this time, however, it may become applicable during the life of the permit.
ARM 17.8.330 Definitions	This rule consists of either a statement of purpose, applicability statement, regulatory definition or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
Sub-Chapter 4 Stack Heights	
ARM 17.8.401 Definitions	This rule consists of either a statement of purpose, applicability statement, regulatory definition or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.402 Requirements ARM 17.8.403 Exemptions	These are procedural rules that have specific requirements that may become relevant to a major source during the permit span.

Sub-Chapter 5 Air Quality Permit Application, Operation and Open Burning Fees	
ARM 17.8.504 Air Quality Permit Application Fees ARM 17.8.514 Air Quality Open Burning Fees ARM 17.8.515 Air Quality Open Burning Fees for Conditional, Emergency, Christmas Tree Waste, and Commercial Film Production Open Burning Permits	These are procedural rules that have specific requirements that may become relevant to a major source during the permit span
Sub-Chapter 6 Open Burning	
ARM 17.8.606 Minor Open Burning Requirements ARM 17.8.611 Emergency Open Burning Permits ARM 17.8.612 Conditional Air Quality Open Burning Permits	The following regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.
Sub-Chapter 7 Permit, Construction and Operation of Air Contaminant Sources	
ARM 17.8.701 *et seq.* Permit, construction and operation of air contaminant sources	The following regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.
Sub-Chapter 8 Prevention of Significant Deterioration	
ARM 17.8.825 Sources Impacting Federal Class I Areas -- Additional Requirements ARM 17.8.826 Public Participation	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
ARM 17.8.804 Ambient Air Increments	The following regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit
Sub-Chapter 9 Permit Requirements for Major Stationary Sources or Major Modifications Located Within Nonattainment Areas	
ARM 17.8.901 Definitions ARM 17.8.902 Incorporation by Reference	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.904 When Air Quality Preconstruction Permit Required ARM 17.8.905 Additional Conditions of Air Quality Preconstruction Permit ARM 17.8.906 Baseline for Determining Credit for Emissions and Air Quality Offsets	These regulations are state regulations, which may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.
Sub-Chapter 10 Preconstruction Permit Requirements for Major Stationary Sources or Major Modifications Located Within Attainment or Unclassified Areas	
ARM 17.8.1001 Definitions ARM 17.8.1002 Incorporation by Reference	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.1004 When Air Quality Preconstruction Permit Required ARM 17.8.1005 Additional Conditions of Air Quality Preconstruction Permit ARM 17.8.1006 Review of Specified Sources for Air Quality Impact ARM 17.8.1007 Baseline for Determining Credit for Emissions and Air Quality Offsets	These regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.
Sub-Chapter 11 Visibility Impact Assessment	
ARM 17.8.1101 Definitions ARM 17.8.1103 Applicability – Visibility Requirements	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.

ARM 17.8.1108 Notification of Permit Application ARM 17.8.1109 Adverse Impact and Federal Land Management	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
Federal Requirements	
40 CFR 50 National Primary and Secondary Ambient Air Quality Standards 40 CFR 51 Requirements for Preparation, Adoption, and Submittal of Implementation Plans 40 CFR 58 Ambient Air Quality Surveillance	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source
40 CFR 52 Approval and Promulgation of Implementation Plans 40 CFR 62 Approval and Promulgation of State Plans for Designated Facilities and Pollutants 40 CFR 70 and 71 State Operating Permit Programs and EPA Regulations on Federal Operating Permit Programs	These rules contain requirements for regulatory authorities and not major sources, these rules can be used to impose specific requirements on a major source.
40 CFR 60.14 Modification 40 CFR 60.15 Reconstruction	These regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.
40 CFR 61, Subpart M National Emissions Standards for Hazardous Air Pollutants - Asbestos	This is a federal regulation that has specific procedural requirements that may become relevant to the major source during the permit term.
40 CFR 63, Subpart A - General Provisions	These federal regulations consist of an applicability statement. These regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.
40 CFR 68 - Chemical Accident Prevention Provisions	This is a federal regulation that provides a stay on this facility type, which is effective until December 22, 1997. After this date, the regulation may become applicable.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. NESHAP/MACT Standards

National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (40 CFR Part 63, Subpart HH) and National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities (40 CFR Part 63, Subpart HHH) was promulgated June 17, 1999. The facility may potentially be subject to Subparts HH and HHH; however, as of the date that Permit #OP2784-03 was issued, the Department has not made an applicability determination. In addition, the facility is potentially subject to 40 CFR Part 63, Subpart ZZZZ (Reciprocating Internal Combustion Engines) and 40 CFR Part 63, Subpart YYYY (Combustion Turbines), once the rules are promulgated.

B. NSPS Standards

As of the date that Permit #OP2784-05 was issued, the Department is unaware of any future NSPS Standards that may be promulgated that will affect this facility. The facility is currently subject to 40 CFR 60, Subpart KKK.

C. Risk Management Plan

As of the date that Permit #OP2784-05 was issued, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply with 40 CFR 68 requirements no later than June 21, 1999; three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.